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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

) CASE NO.: 2:23-cv-6302-HDV-AJR
)
) **DECLARATION OF OLIVIA FLECHSIG**
) **IN SUPPORT OF PLAINTIFF'S**
) **OPPOSITION TO CHEVRON USA,**
) **INC.'S RENEWED MOTION FOR**
) **JUDGMENT AS A MATTER OF LAW**
) **PURSUANT TO FED. R. CIV. 50(b), OR**
) **IN THE ALTERNATIVE, MOTION FOR**
) **NEW TRIAL AND/OR REMITTITUR**
)
) *[Filed concurrently with Plaintiff Mark*
) *Snookal's Memorandum of Points and*
) *Authorities in Opposition to Defendant*
) *Chevron USA, Inc.'s Motion for Judgment as a*
) *Matter of Law, or in the Alternative, Motion*
) *for New Trial and/or Remittitur; and*
) *[Proposed] Order Denying Defendant's*
) *Motion in Full*
)
) District Judge: Hon. Hernan D. Vera
) Magistrate Judge: Hon. A. Joel Richlin
) Action Filed: August 3, 2023
) Trial Date: August 19, 2025
) Judgment Entered: September 3, 2025
)
) Hearing Date: November 13, 2025
) Hearing Time: 10:00 a.m.
) Courtroom: 5B

DECLARATION OF OLIVIA J. FLECHSIG

I, OLIVIA J. FLECHSIG, declare as follows:

1. I am an attorney duly licensed to practice in the State of California and in the Central District of California. I am an Associate at the law firm of Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal. As such, I have personal knowledge of the facts set forth below. I called, I could and would testify to such facts under oath.

2. I make this declaration in Support of Plaintiff Mark Snookal's Opposition to Chevron USA, Inc.'s Renewed Motion for Judgment as a Matter of Law Pursuant to Fed. R. Civ. 50(b), or in the Alternative, Motion for New Trial and/or Remittitur.

3. Attached hereto as **Exhibit A** is a true and correct copy of relevant excerpts of the Reporter's Transcript of Partial Jury Trial Proceedings, dated August 19, 2025, the first day of trial in this case.

4. Attached hereto as **Exhibit B** is a true and correct copy of relevant excerpts of the Reporter's Transcript of Jury Trial Proceedings, dated August 20, 2025, the second day of trial in this case.

5. Attached hereto as **Exhibit C** is a true and correct copy of relevant excerpts of the Reporter's Transcript of Jury Trial Proceedings, dated August 21, 2025, the third day of trial in this case.

6. Attached hereto as **Exhibit D** is a true and correct copy of relevant excerpts of the Reporter's Transcript of Jury Trial Proceedings, dated August 22, 2025, the fourth day of trial in this case.

7. True and correct copies of all cited Trial Exhibits are attached hereto and admitted by the Court as stated:

Trial Exhibit 5, "Physical requirements and working conditions form for REM position 11/9/16 (CUSA000208-220)," admitted into evidence on August 22, 2025.

Trial Exhibit 7, "Escravos Medevac Records for 2017-2022 (CUSA000830-833)," admitted into evidence on August 22, 2025.

1 **Trial Exhibit 8**, “Escravos Fatalities 2017-2022 (CUSA000830-833),” admitted into
2 evidence on August 22, 2025.

3 **Trial Exhibit 25**, “Mental Health Questionnaire – completed by Snookal 7/18/19
4 (CUSA000188),” admitted into evidence on August 22, 2025.

5 **Trial Exhibit 29**, “MSEA Exam of Mr. Snookal Completed by Dr. Sobel – 7/24/19
6 (Snookal-00605-610),” admitted into evidence on August 19, 2025.

7 **Trial Exhibit 30**, “Dr. Irving Sobel’s voicemail message to Mark Snookal and transcript,”
8 admitted into evidence on August 22, 2025.

9 **Trial Exhibit 31**, “Emails between Snookal and Dr. Khan re: Rotational Work in Nigeria –
10 7/24/19,” admitted into evidence on August 19, 2025.

11 **Trial Exhibit 43**, “Email chain re: Mark Snookal’s Medical Report – 8/5/19
12 (CUSA000768-770),” admitted into evidence on August 21, 2025.

13 **Trial Exhibit 44**, “Email thread with Asekomeh, Akintunde re: Akintunde’s opinion [re:
14 Snookal] (CUSA000771-774),” admitted into evidence on August 22, 2025.

15 **Trial Exhibit 46**, “Asekomeh email to Pitan re: Cardiology Summary (CUSA0001526-
16 1527),” admitted into evidence on August 22, 2025.

17 **Trial Exhibit 55**, “Email from Dr. Pitan to Dr. Asekomeh (CUSA000824-827),” admitted
18 into evidence on August 22, 2025.

19 **Trial Exhibit 63**, “Email thread Dr. Frangos to Dr. Levy and Dr. Arenyeka re: Nigeria
20 Medical Determination (CUSA0001003-1006),” admitted into evidence on August 22, 2025.

21 **Trial Exhibit 97**, “Job Offer for Reliability Change Operating Assistant (Snookal-01136),”
22 admitted into evidence on August 22, 2025.

23 **Trial Exhibit 121**, “Dr. Alexander Marmureanu’s CV”, admitted into evidence on August
24 19, 2025.

25 **Trial Exhibit 122**, “Expert Report of Dr. Alexander Marmureanu,” admitted into evidence
26 on August 19, 2025.

27 **Trial Exhibit 132**, “Rotational Expatriate Assignments (Snookal-01285-1301),” admitted
28

1 into evidence on August 20, 2025.

2 **Trial Exhibit 140**, “Anthony Edward Reading’s CV and documents relied upon by Dr.
3 Reading,” admitted into evidence on August 22, 2025.

4 **Trial Exhibit 141**, “Anthony E. Reading PhD Rule 26 Log (Snookal-02056-2064),”
5 admitted into evidence on August 22, 2025.

6 **Trial Exhibit 157**, “Dr. Irving Sobel’s CV,” admitted into evidence on August 22, 2025.

7
8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct.

10 Executed this 10th day of October 2025, in Long Beach, State of California.

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13 
14 OLIVIA J. FLECHSIG